

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001 :
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1:03 MDL 1570 (GBD)(SN)

This document relates to:

Grazioso, et al., v. Islamic Emirate of Afghanistan a/k/a the Taliban, et al.,
1:22-cv-01188 (GBD)(SN)

**DECLARATION OF TIMOTHY B. FLEMING
IN SUPPORT OF MOTION TO SUBSTITUTE UNDER RULE 25**

I, TIMOTHY B. FLEMING, counsel for the *Grazioso* Plaintiffs, pursuant to 28 U.S.C. §1746, hereby submit this Declaration in Support of Motion to Substitute under Rule 25, Fed. R. Civ. P., and state the following:

1. I am of counsel to the firm of Wiggins Childs Pantazis Fisher Goldfarb, PLLC, and my law practice is centered in Washington, D.C., where I am a member of the D.C. Bar.
2. I am counsel of record in the above-referenced case, *Grazioso, et al., v. Islamic Emirate of Afghanistan a/k/a the Taliban, et al.*, and also in four actions in this MDL against the Islamic Republic of Iran and various of Iran's agencies and instrumentalities (*Havlish, Hoglean, Ray, and Maher*), as well as in several cases in this MDL in which the Kingdom of Saudi Arabia, the Republic of the Sudan, and various non-state actors are named Defendants.
3. I am also counsel in numerous judgment enforcement actions against assets of the Islamic Republic of Iran, its agencies and instrumentalities, the Taliban, and others, in both this Court and other courts in connection with judgments in several of the above-referenced cases.

4. Four *Grazioso* Plaintiffs, each an immediate family member of a 9/11 Decedent, have died since filing of the governing Second Amended Complaint in this case, *Grazioso* ECF 29, August 23, 2022. A Motion to Substitute has been filed in order to permit the substitution of the personal representatives of their estates for these deceased Plaintiffs, as stated in **EXHIBIT A** to the Motion. One of these four Plaintiffs lost two sons on 9/11, and therefore there are two entries for him on **EXHIBIT A** and on the proposed form of Order.

5. The clients' families each have provided Plaintiffs' lead counsel's office in Birmingham, Alabama, with documentation of the Plaintiff's death and with documents regarding the appointment of estate personal representatives issued by appropriate state authorities, as listed on **EXHIBIT A** to the Motion. I have personally seen electronic copies of this documentation for each of these four Plaintiffs' estates.

FURTHER THE DECLARANT SAYETH NOT.

This Declaration is made and executed within the United States pursuant to 28 U.S.C. §1746, and it is comprised of five (5) separately numbered paragraphs.

I, TIMOTHY B. FLEMING, declare under penalty of perjury that the foregoing is true and correct.

Executed within the United States on December 27, 2024,

/s/ Timothy B. Fleming

Timothy B. Fleming (DC Bar No. 351114)
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